

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

FRACTUS, S.A.,

Plaintiff

vs.

**SAMSUNG ELECTRONICS CO., LTD., et
al.,**

Defendant.

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NO. 6:09-CV-00203-LED-JDL

JURY TRIAL DEMANDED

**JOINT MOTION TO ENTER PROTECTIVE ORDER AND ESI ORDER AND RULE
ON DISPUTED ISSUES IN BOTH**

Pursuant to the Court's December 14, 2009 Order (Dkt. No. 233), the parties submit a joint protective order that is agreed in part and disputed in part (Exhibit A) and an ESI Order that is agreed in part and disputed in part (Exhibit B). The parties have highlighted the disputes in yellow with their respective arguments in footnotes. The parties respectfully request that the Court rule on the disputed issues in both the protective order and the ESI order and enter appropriate orders for each.

Dated: December 18, 2009

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 18th day of December, 2009.

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